



ST JOHN OF GOD
Health Care

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Owner **Catarina LeGuimaraes**
Area **Governance- Governance/ Risk/Compliance**
Applicability **St John of God Organisation**

GO GRC0005 Conflicts of Interest Policy

Our Vision - We are recognised for care that provides healing, hope and a greater sense of dignity, especially to those most in need.

Our Mission - To continue the healing mission of Jesus.

PURPOSE

The purpose of this policy is to –

- promote and support a culture of honest, ethical conduct and behaviour, excellent corporate governance and transparency in line with St John of God Health Care's (SJGHC) Vision, Mission and Values
- outline the minimum requirements for all caregivers, *Medical Practitioners* and directors to identify and disclose any *Conflicts of Interest* so that they can be recorded and managed effectively
- contribute to the SJGHC Strategic enabler of Strengthening Our Culture

RELATED DOCUMENTS

This policy is to be read in conjunction with –

[GO GRC0005 0001 Conflicts of Interest Procedure](#)

[GO GRC0005 0001 0001 Conflicts of Interest Guideline](#)

SCOPE

This policy applies to -

Organisational

St John of God Health Care Inc. ("SJGHC")

Individual

- a. Caregivers, where any or all of the following apply:
 - i. manager level or above
 - ii. involved in procurement
 - iii. a member of a Hospital Management Committee, Executive Committee or Operational Performance Committee
 - iv. a member of a project steering committee
 - a. Board members and contractors (collectively, "individuals").
- b. *Medical Practitioners* will be managed in accordance with the SJGHC By-Laws for Medical Practitioners.

Collectively referred to as "caregiver"

SUBJECT MATTER

Conflict of Interest

A Conflict of Interest is defined as a situation in which a person might:

1. Derive personal benefit from actions or decisions made in their official capacity; and / or
2. Make a decision on behalf of the organisation that could cause detriment to SJGHC's reputation.

A Conflict of Interest in of itself is not wrong or unethical. However, identifying and managing the situation is important to ensure alignment to our Vision, Mission and Values and public confidence in SJGHC is maintained.

POLICY

1. Declaring Conflicts of Interest
 - a. Individuals must -
 - i. avoid *Conflicts of Interest* wherever possible
 - ii. declare all unavoidable *Conflicts of Interest* to their *Approving Manager*, in accordance with the Conflicts of Interest Procedure and Guideline
 - iii. review their *Conflicts of Interest* annually, in accordance with the procedure.
2. Managing Conflicts of Interest

- a. Approving Managers will –
 - i. complete an assessment of the interest against the individual's duties in accordance with the Guideline and confirm whether a *Conflict of Interest* exists.
 - ii. determine the appropriate *Management Plan* in accordance with the Guideline.
 - iii. record the *Conflict of Interest* in SJGHC's *Conflicts of Interest Register* in accordance with the Guideline and Procedure.
- b. SJGHC will -
 - i. consider any willful contravention of this policy to be serious misconduct
 - ii. maintain a central record of all declared *Conflicts of Interest*, which will be reviewed annually.

BREACH OF POLICY

Failure to comply with this Policy by a member of SJGHC may be considered a breach of the Code of Conduct and may result in disciplinary action.

LEGISLATION

AUTHORITY

[SJGHC Code of Conduct](#)
[SJGHC By-Laws for Medical Professionals](#)

ASSOCIATED DOCUMENTS

[MN0009 Ethics Policy](#)
[GO GRC0006 Gifts, Benefits and Hospitality Policy](#)
[WF R0004 Recruitment and Selection Policy](#)
[WF IR0013 Misconduct Policy](#)
[GO GRC0004 Whistleblowing Policy](#)

GLOSSARY

Approving Manager

For all hospital/service caregivers	CEO
For all hospital CEOs	COOH

For all service CEOs	Relevant GD
For all group services caregivers	Respective GD
For all GDs, COOH, General Counsel & SJG Foundation CEO	GCEO
For the GCEO	GCFO
For Medical Practitioners	CEO
For board members	Board chair
For project steering committee members	Relevant Executive Sponsor

Conflict(s) of Interest

Any situation in which an individual may derive personal benefit from actions or decisions made in their official capacity; and / or make a decision on behalf of the organisation that could cause detriment to SJGHC's reputation. These may be:

- a. **Actual** – the interest directly affects or impacts their personal or private interests, or compromises SJGHC's independence.
- b. **Potential** – the interest could conflict with their official duties in the future, or where there is competing interests because they hold more than one official role or public duty, or where their decision could be seen as comprising SJGHC's independence.
- c. **Perceived** – the interest could be questioned based on a personal or private interest, or could be perceived as compromising SJGHC's independence, but may not actually have impacted any decision.

Conflicts of Interest Declaration Form

The form used to declare Conflicts of Interest in accordance with this policy, either electronic or hard copy.

Conflicts of Interest Register

The register in use at SJGHC for the purpose of recording declared Conflicts of Interest in accordance with this policy.

Management Plan

An agreed method on how to manage declared Conflicts of Interest, recorded on the Conflicts of Interest Register.

Medical Practitioners

Medical practitioners (other than those engaged by way of an employment contract) who are credentialed to provide clinical care at a SJGHC hospital or service pursuant to the SJGHC Bylaws for Medical Practitioners.

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Approval Signatures

Step Description	Approver	Date
Policy Team - Publish	Leanne Lind: Policy Governance Lead	Nov 2021
Approver	Larissa Johnstone: Group Director, Legal, Risk & Compliance	Nov 2021
	Catarina LeGuimaraes: Group Manager Risk & Compliance	Nov 2021